

FILED
IN COUNTY CLERK'S OFFICE

AUG 19 2019

PIERCE COUNTY, WASHINGTON
KEVIN STOCK, County Clerk
BY _____ DEPUTYIN THE Superior COURT OF WASHINGTON
FOR Pierce COUNTYRussell R. WillsMichele Erickson, Plaintiff,

vs.

City of DuPont Police DepartmentCity of DuPont, Defendant.No. 19 2 10290 5SUMMONS AND COMPLAINT
(20 DAYS)TO: City of DuPont Police Dept., City of DuPont, Defendant(s).A lawsuit has been started against you in the above entitled court by Russell R. Wills
and Michele Erickson, plaintiff. Plaintiff's claim is stated in the written

complaint, a copy of which is served upon you with this summons.

In order to defend against this lawsuit, you must respond to the complaint by stating your defense in writing, and serve a copy upon the person signing this summons within 20 (twenty) days after the service of this summons, excluding the day of service, or a default judgment may be entered against you without notice. A default judgment is one where plaintiff is entitled to what plaintiff asks for because you have not responded. If you serve a notice of appearance on the undersigned person you are entitled to notice before a default judgment may be entered.

Any response or notice of appearance which you serve on any party to this lawsuit must also be filed by you with the court within 20 (twenty) days after the service of summons, excluding the day of service.

If you wish to seek the advice of an attorney in this matter, you should do so promptly so that your written response, if any, may be served on time.



This summons is issued pursuant to Rule 4 of the Civil Rules for Courts of Limited Jurisdiction.

DATED

8-19-2019

SIGNATURE OF PLAINTIFF ☐ ATTORNEY FOR PLAINTIFF

Russell R. WINS, Michele Erickson

TYPE OR PRINT NAME

802 Gunn Rd. 1

STREET ADDRESS

Port Angeles

WA 98362

CITY

STATE

ZIP

(360) 775-5737, (360) 460-7124

TELEPHONE NO.

FACSIMILE NO. (REQUIRED IF AVAILABLE)

COMPLAINT

Comes now the above-named plaintiff and states:

1. I am a resident of this county, residing in Port Angeles, Washington.

2. At all times material hereto, Defendant resided in this county, in DuPont, Washington, and is therefore subject to the jurisdiction of this court.

3. (Check one if applicable:)

☐ Defendants are husband and wife and constitute a marital community.

☐ Defendant is a corporation under the laws of the State of Washington.

4. Defendant is indebted to plaintiff in the sum of \$ To Be Determined The basis for this debt is

Procedural misconduct at a routine traffic stop, August 21, 2016
Pain and suffering, Punitive damages,

Wherefore, plaintiff prays for judgment against defendant in the sum of \$ To Be Determined plus interest and plaintiff's costs and disbursements.

I/we declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED

8-19-2019

SIGNATURE OF PLAINTIFF ☐ ATTORNEY FOR PLAINTIFF

Russell R. WINS, Michele Erickson

TYPE OR PRINT NAME

802 Gunn Rd.

STREET ADDRESS

Port Angeles, WA

98362

CITY

STATE

ZIP

(360) 775-5737, (360) 460-7124

TELEPHONE NO.

FACSIMILE NO. (REQUIRED IF AVAILABLE)

